

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF THE PETITION)
OF KAVANAGH FISHERIES, INC.,)
OWNER OF THE F/V ATLANTIC) **CIVIL ACTION NO. 05-10637-GAO**
FOR EXONERATION FROM OR)
LIMITATION OF LIABILITY)

PETITIONER'S REQUEST FOR HEARING

The Petitioner respectfully requests that the Motion of Petitioner, Kavanagh Fisheries, Inc. to Compel Surrender of the Letter of Undertaking or, Alternatively, Allow the Withdrawal of the Letter of Undertaking Issued to Lombard Corporate Finance (December 3) Limited and Berryford Shipping (U.K.) Limited and Allow Substituting of a Bond in its Place be heard at the previously scheduled hearing today, May 25, 2005, at 2:00 p.m.

For the Petitioner,
By its attorneys,

REGAN & KIELY LLP

/s/Joseph A. Regan

Joseph A. Regan, Esquire (BBO #543504)
Syd A. Saloman, Esquire (BBO #645267)
85 Devonshire Street
Boston, MA 02109
(617)723-0901